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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KAITLYN CARAOTTA,

Defendant.

Case No.: 24-cr-00080-JAM

**STIPULATION AND ORDER TO  
CONTINUE CHANGE OF PLEA AND  
EXCLUDE TIME UNDER SPEEDY  
TRIAL ACT**

Date: September 10, 2024

Time: 9:00 a.m.

Court: Hon. John A. Mendez

The United States of America, by and through Special Assistant U.S. Attorney Matthew De Moura, defendant KAITLYN CARAOTTA, by and through her counsel Johnny L. Griffin, III, hereby agree and stipulate as follow:

1. The defendant was arraigned on an Information on July 8, 2024, and waived Indictment.
2. Since July 8, 2024, Initial Appearance to the present date, the parties have been reviewing the discovery and communicating with one another during this time period to make sure the case continues to move forward towards resolution and/or trial.

STIPULATION AND ORDER

- 1 3. The United States has additional discovery to provide the defense as the parties move
- 2 towards resolution and/or trial.
- 3 4. The discovery in this case is voluminous and involves multiple jurisdictions where
- 4 conduct is alleged to have occurred.
- 5 5. The proposed change of plea date on October 22, 2024, represents the earliest and
- 6 most convenient date that both counsel are available. This requested date takes into
- 7 account counsels' schedules, defense counsels' commitments to other clients, and
- 8 defense counsels' need for preparation and further investigation into this case.
- 9 6. As to the defendant, exclusion of time is particularly appropriate because she is not
- 10 detained pending trial and this would allow counsel sufficient time to review and
- 11 investigate the discovery as well as prepare for defense.

12 The parties further believe that time should be excluded, in that failure to grant the  
13 requested case schedule would unreasonably deny the defendant and the government the  
14 reasonable time necessary for effective preparation, taking into account the parties' due diligence  
15 in prosecuting this case. 18 U.S.C. Section 3161(h)(7)(B)(iv). Based on the foregoing facts, the  
16 parties request that the Court vacate the September 10, 2024 change of plea and reset the case  
17 for a change of plea to be held on October 22, 2024, at 9:00 a.m. The parties further agree and  
18 request that the Court exclude the time between September 10, 2024, and October 22, 2024, from  
19 the computation of time in which trial must commence under the Speedy Trial Act, pursuant to  
20 Local Code T-4. The parties agree that the interests of justice served by excluding the time  
21 between September 10, 2024, and October 22, 2024, under the Speedy Trial Act, outweigh the  
22 best interests of the public and the defendant in a speedy trial. The parties request that the Court  
23 adopt the facts set forth herein and order time excluded from September 10, 2024, to and  
24 including October 22, 2024, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), and Local Code

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28 STIPULATION AND ORDER

T-4, to allow defense counsel to investigate and prepare for trial. With this stipulation, 0 of 70 days have been used against the computation of time within which a trial must commence.

Dated: September 3, 2024

PHILLIP A. TALBERT  
United States Attorney

By: /s/ MATTHEW DE MOURA  
MATTHEW DE MOURA  
Special Assistant United States  
Attorney

Dated: September 3, 2024

/s/ JOHNNY L. GRIFFIN, III  
JOHNNY L. GRIFFIN, III  
Counsel for Defendant  
Kaitlyn Caraotta

**FINDINGS AND ORDER**

The Court, having received, read, and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. The Court **VACATES** the September 10, 2024 change of plea and **RESETS** the change of plea on **October 22, 2024, at 9:00 a.m.** The Court also specifically finds that based on the facts set forth in the parties' stipulation, the failure to exclude the time between September 10, 2024, and October 22, 2024, would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court further finds that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. Time from September 10, 2024, to and including October 22, 2024, is excluded from the computation of time within which the trial of this case must commence under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), and Local Code T-4. With this stipulation, 0 of 70 days have been used against the computation of time within which a trial must commence.

IT IS SO ORDERED.

Dated: September 06, 2024

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE